

UNITED STATES BANKRUPTCY COURT FOR  
THE WESTERN DISTRICT OF OKLAHOMA

IN RE: JUANA N. LOZANO  
AKA JUANA N. GUERRERO  
AKA JUANA NOELIA LOZANO

Debtor.

Bk. Case No. 13-14556 JDL  
CHAPTER 13

AMENDED MOTION TO VACATE ORDER FOR RELIEF  
FROM THE AUTOMATIC STAY AND ABANDONMENT OF PROPERTY  
AND NOTICE OF OPPORTUNITY FOR HEARING

COMES NOW, the Applicant, HSBC Bank USA, National Association as Trustee for Nomura Home Equity Loan, Inc., Asset- Backed Certificates, Series 2006-HE1 and applies to the Court to vacate the Order for Relief from the Automatic Stay filed on August 25, 2017, on the following grounds:

1. Debtor's mortgage payments are being paid inside the Plan which will allow the mortgage payments to be brought current within a reasonable time.

WHEREFORE, HSBC Bank USA, National Association as Trustee for Nomura Home Equity Loan, Inc., Asset- Backed Certificates, Series 2006-HE1 prays that the Order for Relief from the Automatic Stay entered on August 25, 2017, be vacated to allow debtors to continue to pay this debt inside the plan.

**NOTICE OF OPPORTUNITY FOR HEARING**

**Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document.** If you do not want the Court to grant the requested motion, or you wish to have your views considered, you must file a written response or objection to the requested motion with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than **14** days from the date of filing of this motion to vacate. You should also mail a file-stamped copy of your response or objection to the undersigned Movant attorney (and others who are required to be served) and file a certificate of service with

the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice. **The 14 day period includes the 3 days allowed for mailing provided for the Rule 9006(f) Fed.R.Bankr. Proc.**

SHAPIRO & CEJDA, LLC

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CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 27th of September, 2017, the foregoing amended motion was mailed via U.S. Mail, first class, postage prepaid to the following parties, to-wit: Juana N. Lozano, 9913 S. Klein Avenue, Oklahoma City, OK 73139, (Debtor) and all parties listed on the attached Debtor's matrix. Further, I certify that a true and correct copy of the foregoing amended motion was electronically served on the 27<sup>th</sup> of September, 2017, using the CM/ECF system to the following parties: Timothy L. Wallace, (Attorney for Debtor), John T. Hardeman, (Trustee).

s/Kirk J. Cejda  
Kirk J. Cejda #12241

File No. 14-122221